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Sent: Thursday, 17 November 2011 7:54 a.m.
To: Info
Subject: Indicative work programme thoughts

While we realise the following may be too low level, items that Contact (in the context of the retail market activities) would like to see addressed include:

1. Replace initial allocations with a top down (TOU + ((gas gate – TOU) x market share)) mechanism for daily allocations, and use interim and final allocations to apply seasonal shapes to metered consumption to refine accuracy. Rule 37.2 breaches are a source of much frustration and distraction and impossible to achieve compliance with unrealistic accuracy criteria.
2. Additional meter owner fields on the registry to establish a single source of truth, that will assist retailers in achieving accuracy of meter set-ups and billing/reconciliation, and consistency. These include:
 - a. Meter pressure
 - b. Number of dials
3. We would also like to see meter make and model added to the registry as a meter owner field. This information is not on the GTN switch file but is requested by most retailers as additional information. While it can be obtained from the meter owner down the track this is some time after the switch. Meter make and model is a mandatory field in some systems, and it provides another check on set-up accuracy and usage expectation.
4. Ensure accountability in rules (Reconciliation Rule 27 is the logical place) for accuracy and compliance of registry data that affects reconciliation accuracy (e.g. Distributors – ICP altitude, network pressure, gas gate. Meter owners - meter pressure, number of dials). Provide for audits of distributors and meter owners of registry processes and data that affects accuracy of retailer meter set-ups and billing/reconciliation.
5. Facilitate completion of, and buy-in to, industry information exchange protocol that supports retailer compliance with Gas (Safety & Measurement) Regulations 2010.
6. Finalise guideline for gas billing factors to improve accuracy/consistency/compliance across industry
7. Resolve issues around fixed 0 on meter registers, whether to be included as additional dial or as a multiplier of x10.
8. The rules around TOU estimates currently focus on the wrong issue and should be amended such that the presence of estimated data should not be a reason for a breach of the rules, but not using an appropriate process to estimate missing TOU data would be. Submissions should still flag the presence of estimated TOU data, and performance audits should include checks of the process used to estimate data (essentially set out in Schedule 1 to the rules).

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